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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KENTRELL D. WELCH,

Petitioner,

vs.

BRIAN WILLIAMS, *et al.*,

Respondents.

Case No. 2:19-cv-00193-RFB-VCF

**UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME
(FIRST REQUEST)**

Respondents, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, hereby respectfully move this Court for an order granting a thirty-one (31) day enlargement of time, to and including March 7, 2022, in which to file and serve their response.

This motion is based upon the provisions of Rule 6(b) of the Federal Rules of Civil Procedure and the attached Declaration of Counsel, as well as all other papers, documents, records, pleadings, and other materials on file herein.

There has been no prior enlargement of Respondents' time to file said response, and this motion is made in good faith and not for the purposes of delay.

RESPECTFULLY SUBMITTED this 4th day of February, 2021.

AARON D. FORD
Attorney General

By: /s/ Charles L/ Finlayson
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DECLARATION OF COUNSEL

I, Charles L. Finlayson, hereby state, based on personal knowledge and/or information and belief, that the assertions of this declaration are true:

1. I am a Senior Deputy Attorney General of the Post-Conviction Division of the Nevada Attorney General's Office, and I make this declaration on behalf of Respondents' motion for enlargement of time.

2. My response in this matter is presently due February 4, 2022. By this motion, I am requesting a 31-day extension of time to file my response, up to and including March 7, 2022.

3. I require additional time to get up to speed on the complicated issues raised by the petitioner in his motion. I recently filed responses in *McClain v. Williams*, 2:17-cv-00753-RFB-NJK; and *Orduna v. Garrett*, 20-cv-00641-MMD-CLB. I have also been working diligently to complete responses in *Leonard v. Gittere*, 2:99-cv-00360-MMD-DJ, a capital case. In addition, the Ninth Circuit Court of Appeals recently requested additional briefing in a case by February 17, 2022, and indicated that it was unlikely to grant any extensions.

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CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General and that on this 4th day of February, 2022, I served a copy of the foregoing **UNOPPOSED MOTION FOR ENLARGEMENT OF TIME (FIRST REQUEST)**, by U.S. district court CM/ECF electronic filing to:

T. Kenneth Lee
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Las Vegas, NV 89101
Ken_lee@fd.org

/s/ Perla M. Hernandez